

EXHIBIT B

In the Matter Of:

JOHNSON vs FORD MOTOR COMPANY

NICHOLAS J. ROWAN, SR.

October 03, 2019

Prepared for you by



Bingham Farms/Southfield • Grand Rapids

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1	as why I'm here.	1 career.
2 Q	So it's your testimony, sir, that you never sent	2 Q You made comments about you knew she had pierced
3 DeAnna any sexual texts?	3 nipples and you could see them through her shirt?	
4 A Yes, that is my testimony.	4 A No.	
5 Q You never asked her to show you her breasts or	5 Q Is that what you told her?	
6 pictures of her breasts?	6 A No. The only comment was ever made regarding that	
7 A That is my testimony.	7 was her telling people, yeah, they're not a bad	
8 Q Did she ever send you pictures of her breasts?	8 thing to have.	
9 A No.	9 Q Did you bump her in the chest area and ask her if	
10 Q Have you used the phrase flash pic?	10 that hurt her piercing?	
11 A No. I don't even know what that means.	11 A No.	
12 Q You don't know what flash pic means?	12 Q Did you learn that someone had using a label gun	
13 A No, I don't.	13 left a label on her desk that said one silver, one	
14 Q Did you call DeAnna a chocolate Jolly Rancher?	14 gold?	
15 A No.	15 A No.	
16 Q Or a Jolly Rancher with legs?	16 Q Are you denying that you were responsible for	
17 A No.	17 that?	
18 Q Did she ask you what you meant with respect to a	18 A Yeah, I'm not sure what that refers to.	
19 comment about a Jolly Rancher and you said she was	19 Q Well, did you ever say to DeAnna something to the	
20 a chocolate treat you wanted to lick and suck on?	20 effect of you knew she had one silver and one gold	
21 A Absolutely not.	21 nipple ring?	
22 Q With respect to taking a picture of Ms. Johnson	22 A No.	
23 from behind what is your position on that? You did	23 Q Did you grab her breasts?	
24 that or did not do that?	24 A No.	
25 A She --	25 Q Did you ever apologize to her for grabbing her	
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1	MR. DAVIS: Asked and answered.	1 breasts?
2	Go ahead.	2 A No.
3 A	She was at my desk and I was on the other side of	3 Q Why would you have done that --
4 the line and I took a picture and said uh-huh. And	4 A I --	
5 then I don't remember the comment that I made to	5 Q -- or you just never did it?	
6 her when I showed it to her, and I said, oh, look,	6 A No, I didn't. I -- and I even have the text	
7 in my stuff again.	7 message. We were in my cubicle one time and I had	
8 Q Why were you taking a picture of her from behind?	8 bumped her leg and I felt bad about bumping her leg	
9 A Because I was behind her and she was at my desk.	9 and I apologized for that because I remember	
10 Q Why would you take a picture?	10 apologizing for that and I'm like --	
11 A Just to show her, I said, look, you're at my desk	11 Q Bumped her leg with what part of your body?	
12 again getting into my stuff. We had a very good	12 A Just my arm.	
13 relationship as far as I knew. We had playful	13 Q Why would you need to apologize for bumping her	
14 banter back and forth about work stuff.	14 leg with your arm?	
15 Q Did you ever text her and use the word come, but	15 A Well, it was like her thigh and that's just, you	
16 spell it c-u-m?	16 know, too close for comfort for me so I said, oh,	
17 A No.	17 sorry.	
18 Q Did you ever complain to her that she wasn't	18 Q Then you followed up with a text or not?	
19 sending you the nude pictures you had asked for?	19 A Yeah. And she had written back something like a	
20 A No.	20 slip is a slip. I still have it on me word for	
21 Q Did you have any discussions with DeAnna about	21 word, but it said something like, oh, a slip is a	
22 nipple piercing?	22 slip or something like that.	
23 A She had mentioned one time with -- there was me	23 Q Did DeeDee tell you she was going to report you to	
24 there, Shaun there, somebody else, I'm not sure who	24 HR?	
25 it was, but she had mentioned because of her rap	25 A Never came up. Until the day I got walked out I	

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1	referring to her itching from a potato sack because	1	Q So what is this referencing? She's saying are you
2	you got potato bugs and all sorts of stuff like	2	going in at 3:21 p.m. You respond are you
3	that so, guess what, take a shower, get rid of the	3	inviting, oh, dot, dot, dot, wait, dot, dot, dot,
4	itching.	4	work, dot, dot, dot, no?
5	Q Look at Page 44. Do you know why you would text	5	A That was --
6	her whatever, dot, dot, dot, tease, dot, dot, dot?	6	Q What does that refer to?
7	A In that reference right there?	7	A That was probably another playful banter. I can
8	Q Yes.	8	see that.
9	A No, I don't even know what that was just about,	9	Q Regarding sex?
10	whatever, tease. I have no idea.	10	A It could be, but I mean are you inviting -- to me
11	Q Do you think Deanna Johnson was a tease?	11	I'm saying are you inviting because they don't pay
12	A No.	12	me to come in unless I get paid. And then I said,
13	What are these photos of on 44 and 45 if you can	13	oh, wait, work, no. So my first are you inviting
14	make them out?	14	was to work because they don't just let us come in
15	A It's a pillar at work. There's a water line right	15	at any time so, oh, you're inviting me to come to
16	there and there's a sign at the top that says fire	16	work.
17	extinguisher. That's what's in dead center so	17	Q So is that a sexual reference?
18	that's what I'm thinking it had something to do	18	A I think the last one was. I think I did, but,
19	with, yeah, because the next one shows the water.	19	like I said, that was one of the few playful
20	There should be a fire extinguisher hanging right	20	banters between us right there, I believe so.
21	there and there's no fire extinguisher.	21	Q Look at 62. This page includes a photo of you and
22	So probably for the safety committee, I run	22	another woman --
23	around taking pictures, hey, we should have a fire	23	A Yes.
24	extinguisher here and that kind of stuff so that	24	Q -- and a woman, correct?
25	way before the next shift gets there they could get	25	A Yes.
		Page 122	Page 124
1	fire extinguishers out there for safety reason.	1	Q Do you know who that woman is?
2	Q Turn to 48.	2	A Mary her name is. She's another supervisor I was
3	A Okay.	3	training. She was actually on another shift and
4	Q At 4:12 a.m. or 4:16 a.m., depending on how you	4	she came into this shift to train.
5	read this, you're texting DeAnna Johnson cum,	5	Q Is that Mary Fletcher?
6	c-u-m, see me upstairs. Do you see that?	6	A I believe Fletcher, yes.
7	A I do.	7	Q Did you ever tell DeAnna that you were having sex
8	Q You testified under oath a few minutes ago that	8	with Ms. Fletcher?
9	you never would have texted anything like that to	9	A No, absolutely not.
10	my client, correct?	10	Q Why would you send her a picture of you and
11	A And that is correct.	11	Ms. Fletcher?
12	Q So how is that we see it here in black and white?	12	A Because it says right there leave me at Mary's
13	A Once again, I don't know, but I would not use that	13	Mercy.
14	spelling. I know what that would refers to, and,	14	Q Meaning what?
15	no, I don't use that kind of spelling.	15	A Meaning that she was working with me for that day.
16	These are the ones that I have here. This is	16	It was, oh, look, left me at her mercy. Because
17	about I'm on my way into work to see if I have that	17	she wasn't there, she was gone that day so it's
18	paper to see what he's talking about.	18	like, oh, look, you left me at Mary's mercy.
19	Q What page are you on?	19	Nothing wrong with that. I see nothing wrong with
20	A I'm sorry. This is 52.	20	that.
21	Q So you should have everything from here on out,	21	Q Were you ever hoping that DeAnna would send you
22	correct?	22	pictures?
23	A I believe so.	23	A No.
24	Q Do you have 51 in your phone?	24	Q Take a look at 66. It looks like DeAnna has sent
25	A 51, yes.	25	you -- and then this looks like November 17, 2018,